

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Case No. 09-10243-MLW
)	
v.)	
)	
RYAN HARRIS, a/k/a DerEngel,)	
)	
and)	
)	
TCNISO, INC.,)	
Defendants)	

GOVERNMENT'S ASSENTED-TO MOTION TO CONTINUE
DEADLINE FOR RESPONSE TO DEFENDANT'S MOTION TO DISMISS

The government asks the Court to continue, until February 14, 2010, the deadline for the government's response to defendant Ryan Harris's Motion to Dismiss for Lack of Venue. The government's response is currently due February 7.

The government asks for this additional time because the defendant's 21-page motion raises a series of complex venue-related issues that the government needs additional time to adequately address. The defendant also raises issues relating to duplicity, and these issues have caused the government to begin planning towards superseding the indictment, in an effort to avoid further litigation about the indictment's validity. Furthermore, the undersigned AUSA was out of the district interviewing witnesses for an upcoming trial almost all of last week. Defense counsel has

assented to this motion.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Adam Bookbinder
Adam J. Bookbinder
Assistant U.S. Attorney
Mona Sedky
Department of Justice Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Adam Bookbinder
Adam Bookbinder

Dated: February 4, 2011